

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

A 1988 BLACK MERCEDES BENZ
AUTOMOBILE, MODEL 300E, FOUR
DOOR SEDAN, IDENTIFIED BY
VIN #WDBEA30D3JA688786,
LICENSE PLATE #2380LEM,

Defendant.

NO.

NOTICE OF VERIFIED COMPLAINT
FOR FORFEITURE IN REM

John Griffin
XXXXXXXXXXXXXXXXXX
Edmonds, WA

John Griffin
XXXXXXXXXXXXXXXXXX
Seattle, WA

Chantelle Victor
XXXXXXXXXXXXXXXXXX
Seattle, WA

A civil complaint seeking forfeiture pursuant to Title 18, United States Code,
Section 981(a)(1)(C), alleging that the defendant property is derived from proceeds
traceable to the crimes of Computer Fraud and Abuse, Wire Fraud, Identify Fraud, and
Aggravated Identity Theft, in violation, respectively, of Title 18, United States Code,

1 Sections 1030(a)(4) and (a)(5)(A), 1343, 1028(a)(7), and 1028(A), and also was used to
2 facilitate the commission of the listed crimes, was filed on April 14, 2011. Said civil
3 complaint was filed in the United States District Court for the Western District of
4 Washington, by Assistant United States Attorney Richard E. Cohen, on behalf of the
5 United States of America, Plaintiff, against the above-captioned defendant currency. The
6 complaint alleges that the defendant currency may, for the causes stated in the complaint,
7 be forfeited to the United States.

8 In order to avoid forfeiture of the defendant currency, any person claiming an
9 interest in the defendant currency must file a statement of interest or right in the manner
10 set forth in Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and
11 Asset Forfeiture Actions, Federal Rules of Civil Procedure, except that such claim must
12 be filed not later than 35 days after the date of service of the complaint or, if service is by
13 publication, not later than 60 days after the first day of publication of notice of the filing
14 of the complaint on an official internet government forfeiture site (currently
15 www.forfeiture.gov). In addition, any person having filed such a claim shall also file an
16 answer to the complaint not later than 21 days after the filing of the claim.

17 Supplemental Rule G(5)(a) provides in pertinent part: "(i) A person who asserts an
18 interest in the defendant property may contest the forfeiture by filing a claim in the court
19 where the action is pending. The claim must: (A) identify the specific property claimed;
20 (B) identify the claimant and state the claimant's interest in the property; (C) be signed by
21 the claimant under penalty of perjury; and (D) be served on the government attorney...."
22 Supplemental Rule G(5)(b) continues: "A claimant must serve and file an answer to the
23 complaint or a motion under Rule 12 within 21 days after filing the claim."

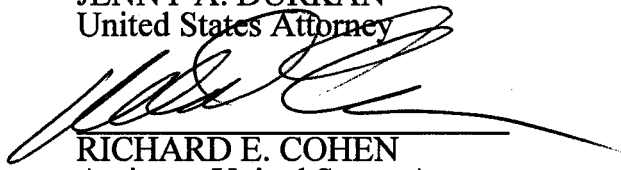
24 Claims should be filed with the Office of the Clerk, United States District Court
25 for the Western District of Washington, 700 Stewart Street, Lobby Level, Seattle,
26 Washington, 98101, and a copy should be served on the United States Attorney's Office,
27 Attention: Richard E. Cohen, Asset Forfeiture Unit, 700 Stewart Street, Suite 5220,
28 Seattle, Washington 98101-1271.

1 Additional procedures and regulations regarding this forfeiture action are found at
2 Title 18, United States Code, Section 983.

3 DATED this 13th day of April, 2011.

4 Respectfully submitted,

5 JENNY A. DURKAN
6 United States Attorney

7 
8 RICHARD E. COHEN
9 Assistant United States Attorney
10 United States Attorney's Office
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